

EB Docket No. 06-36

**CERTIFICATION OF CPNI FILING FOR 2010  
PURSUANT TO 47 C.F.R. §64.2009(e)  
Form 499 Filer ID No. 801762**

**February 10, 2011**

I certify that I am an officer of Pioneer Long Distance, Inc.; and I have personal knowledge that Pioneer Long Distance, Inc. has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

Loyd Benson

Officer's Printed Name

Loyd Benson

Officer's Signature

President

Title

February 10, 2011

Date

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I certify that I am an officer of Cellular Network Partnership d/b/a Pioneer Cellular; and I have personal knowledge that Cellular Network Partnership d/b/a Pioneer Cellular has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

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I certify that I am an officer of Pioneer Telephone Cooperative, Inc.; and I have personal knowledge that Pioneer Telephone Cooperative, Inc. has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

Loyd Benson

Officer's Printed Name

Loyd Benson

Officer's Signature

President

Title

February 10, 2011

Date

**EB Docket No. 06-36**

**CERTIFICATION OF CPNI FILING FOR 2010 Covering the Prior Calendar Year 2010  
PURSUANT TO 47 C.F.R. §64.2009(e)**

**1. Date Filed:** February 10, 2011

**2. Names of Companies covered by this certification:**

Pioneer Telephone Cooperative, Inc. - Form 499 Filer ID No. 801747  
Pioneer Long Distance, Inc. – Form 499 Filer ID No. 801757  
Cellular Network Partnership d/b/a Pioneer Cellular – Form 499 Filer ID No.  
801762

**3. Form 499 Filer IDs:**

Form 499 Filer ID No. 801747 (Pioneer Telephone Cooperative, Inc. )  
Form 499 Filer ID No. 801757 (Pioneer Long Distance, Inc.)  
Form 499 Filer ID No. 801762 (Cellular Network Partnership, d/b/a Pioneer Cellular)

**4. Name of signatory:** Loyd Benson

**5. Title of signatory:** Chief Executive Officer

**6. Certification:**

I, Loyd Benson, certify that I am an officer of the companies named above, and acting as an agent of each of the companies, that I have personal knowledge that each of the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

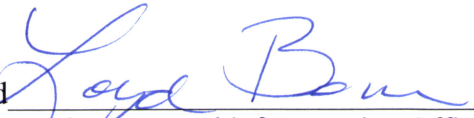
Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The companies have not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.



Pioneer has received one customer complaint in the past year concerning the unauthorized release of CPNI. A summary of the complaint and the remedial actions taken by Pioneer are set forth in the attachment to this Certification.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed   
Loyd Benson, Chief Executive Officer

On Behalf of  
PIONEER TELEPHONE COOPERATIVE, INC.  
PIONEER LONG DISTANCE, INC.  
CELLULAR NETWORK PARTNERSHIP  
d/b/a PIONEER CELLULAR

Date: February 10, 2011

**Attachments:** 1. Accompanying Statement of Compliance explaining CPNI procedures  
2. Summary of customer complaint in Calendar Year 2010

ATTACHMENT 1  
**STATEMENT OF COMPLIANCE WITH THE  
FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES  
AND EXPLANATION OF CPNI PROCEDURES**

Pioneer Telephone Cooperative, Inc., Pioneer Long Distance, Inc., and Cellular Network Partnership d/b/a Pioneer Cellular, are hereinafter referred to as ("Pioneer"). Pioneer's operating procedures ensure that Pioneer is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

Pioneer has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of Pioneer that is made available to us by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that we bill for received by our customers; except that such term does not include subscriber list information. Our employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent, or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

Pioneer has implemented safeguard procedures to protect our customers' CPNI from pretexters, including, but not limited to, the adoption and implementation of a policy for customer's requests for CPNI consistent with 47 C.F.R. §64.2010.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.

ATTACHMENT 2  
**SUMMARY OF CUSTOMER COMPLAINT IN CALENDAR YEAR 2010**

Pioneer Cellular received one customer complaint concerning the unauthorized access to or unauthorized disclosure of CPNI during the Calendar Year 2010. In September, 2010, a customer service representative mistakenly provided wireless detailed calling records to a user on a wireless account who was not listed as the primary account holder in Pioneer's records. The circumstances of this incident were as follows: the primary account holder's son-in-law came into a local Pioneer office and requested copies of the September, 2010 wireless bill, which the customer service representative provided him. Although the individual requesting the bill copies had a phone on the customer's family plan, the gentleman was not listed as the primary account holder and should not have been provided the requested information.

On September 30, 2010, the primary account holder called the local business office and complained that her son-in-law had acquired the call detail records. The local Pioneer personnel immediately contacted the Legal Division and Human Resources Division at Pioneer's headquarters to report the breach, pursuant to Pioneer's CPNI Procedures Manual. An immediate investigation ensued into the incident and it was confirmed that the customer service representative had mistakenly given the September, 2010 cellular bill to the son-in-law, who was not the primary account holder.

Pursuant to 47 C.F.R. §64.2011, Pioneer Telephone Cooperative, Inc., on behalf of Pioneer Cellular, filed a Data Breach Report to notify the United States Secret Service and the Federal Bureau of Investigation on October 4, 2010. Pioneer also contacted the primary account holder to acknowledge and apologize for the breach, and the primary account holder informed Pioneer personnel that she did not want to pursue the matter any further. Pioneer took appropriate action to reprimand the customer service representative who had mistakenly provided the call detail records to the user on the wireless account, on the basis of the incorrect understanding that the requesting party was entitled to the information because he had a phone on the account.

Pioneer reprimanded the employee and required her to take two days of unpaid leave. In addition, the employee was retrained, by her supervisor, in one-on-one training, on Pioneer's CPNI rules and procedures, in order to ensure prevention of any further errors. The employee has also been subjected to additional supervision to further ensure compliance.

In addition, Pioneer reviewed all aspects of its CPNI compliance procedures and training in order to ensure that the occurrence could not have been avoided by revisions to the established procedures. As a result of this review, Pioneer is confident that its procedures are both consistent with the CPNI requirements and effective. The occurrence was the result of a human error and misunderstanding by an employee who had been trained and reviewed with respect to ensuring full regard, and for the procedures and the required implementation.